

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ETHICON WAVE 8 CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO PLAINTIFFS’
MOTION TO EXCLUDE THE TESTIMONY OF MICHAEL KARRAM, M.D.**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively, “Ethicon”) submit this notice in response to Plaintiffs’ Notice of Adoption of Prior *Daubert* Motion of Michael Karram, M.D. for Wave 8, Doc. 6809. In their Notice of Adoption, Plaintiffs adopt and incorporate their *Daubert* motions filed against Michael Karram for Ethicon Waves 1, 2 and 3. *See* Dkt. 2091, 2446, and 2849 (motions) & Dkt. 2092, 2471, and 2851 (memoranda in support).¹ Ethicon hereby adopts and incorporates by reference its Responses to Plaintiffs’ *Daubert* motions filed against Michael Karram, M.D., in Waves 1, 2, 3 and 4. Dkt. 2133, 2424, 2951, and 3785. This response applies to the Wave 8 cases identified in Exhibit A to Plaintiffs’ Notice of Adoption.

¹ On August March 29, 2017, this Court issued a Memorandum Opinion and Order on Plaintiffs’ Wave 2 Motion to Exclude the Expert Testimony of Michael Karram, M.D. [ECF No. 2446], Dkt. 3542 (Opinion and Order), which was adopted for the Wave 3 cases on July 20, 2017, for Wave 4 on July 23, 2018, for Wave 5 on July 26, 2018, and for Wave 6 on July 27, 2018, Dkt. 4174, 6287, 6356, and 6416 (respective Orders Adopting).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, William M. Gage, certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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